

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Industrial Container Services, Inc.
1385 Blatt Boulevard
Gahanna, OH 43230**

ATTENTION:

Brian Grannan, Facility Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Industrial Container Services, Inc. (ICS or you) to submit certain information about the facility at 1385 Blatt Boulevard, Gahanna, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

ICS owns and operates an emission source at the Gahanna, Ohio facility. We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan and the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products at 40 C.F.R. Part 63, Subpart MMMM.

ICS must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

ICS must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413, and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent and by the procedures set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emission data, standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term "emission data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

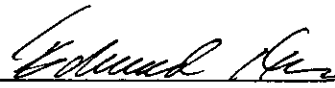
We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject ICS to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Alexandra (Sasha) Letuchy or Manoj P. Patel at (312) 886-6035 or (312) 353-3565, respectively, or by e-mail at letuchy.alexandra@epa.gov or patel.manojkumar@epa.gov, respectively.

Date

12/19/18



Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as a compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information ("CBI") must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products at 40 C.F.R. Part 63, Subpart MMMM.

Appendix B

Information You Are Required to Submit to EPA

Industrial Container Services, Inc. (ICS) must submit the following information requested for its Chicago operation (facility) located at 1385 Blatt Boulevard, Gahanna, Ohio, pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414. For Requests 1 to 27, provide the information within forty-five (45) calendar days from receipt of this letter and these requests cover the time period from January 1, 2014 to the date you receive this request, unless otherwise noted in the request. Request 28 has separate deadlines that are set forth therein.

1. Provide a schematic diagram of the facility, depicting the overall process.
2. Submit a detailed narrative description of the processes employed at the facility to refurbish or recycle steel and plastic drums and describe each piece of process equipment.
3. For the drum refurbishing and recycling operation(s) at the facility, provide its installation date and a date and detailed narrative description of any modification(s) to the process equipment.
4. Provide the number of drums (steel and plastic) received on a monthly and yearly basis from each open head and tight head processes, in Microsoft Excel or other compatible format.
5. Provide the number of drums (steel and plastic) that are refurbished at the facility on a daily, weekly, monthly, and yearly basis, in Microsoft Excel or other compatible format.
6. Provide the number of drums (steel and plastic) repaired (if any) at the facility on a daily, weekly, monthly and yearly basis, in Microsoft Excel or other compatible format.
7. Provide the average hourly rate of drums and the maximum hourly rate of drums processed through each open head and tight head process (i.e., wash line) on a monthly basis.
8. Provide all documents for the past 6 months related to the materials in the drums (steel and plastic) received by the facility, including, but not limited to:
 - a. Resource Conservation Recovery Act (RCRA) empty container certifications;
 - b. Hazardous waste manifests;
 - c. Technical data sheets;
 - d. Material safety data sheets; and
 - e. Analytical data on the materials.
9. Provide copies of all air quality permits issued by the Ohio Environmental Protection Agency (OEPA), including, but not limited to, Division of Air Pollution Control Title V

Permit (Title V Permit), Permits to Install or Construction Permits, and Permit to Operate that are not publicly available.

10. Provide a list of all air quality enforcement actions related to the facility taken by any state or local regulatory agency. Include copies of any air quality-related administrative or judicial complaints; any notices of violation or notices of noncompliance; any documents resolving violations, such as consent decrees or consent orders; and any orders such as administrative orders.
11. To the extent not provided in response to a request above, provide copies of any correspondence from the state, local, or federal permitting authority regarding the installation or modification of any emission unit or the emission limits for any emission unit at the facility, including, but not limited to, applicability determinations, regulatory interpretations, and approval orders.
12. Provide a detailed description of the type and amount of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) emitted by the facility, in pounds per hour and tons per year. Submit your response with supporting information including but not limited to air emissions calculations.
13. For each process at the facility emitting VOCs or HAPs, provide the actual hours of operation in hours per day, days per week, and hours per year.
14. Provide a list of all surface coatings/linings used at the facility including the amount of each used weekly, monthly, and yearly.
15. Provide current and previous copies of all Safety Data Sheets and Technical Data Sheets for all surface coatings, solvents, and thinners used at the facility.
16. Provide copies of all daily visible emissions observations log (i.e., EPA Method 9 readings, pursuant to 40 C.F.R. Part 60 Appendix A-4, or EPA Method Alt 082 readings, ASTM D7520-09) when the drum reclamation furnace is in operation.
17. Describe any procedures employed at the facility to prevent spillage, escape or emissions of organic compounds from the handling, transportation, storage and disposal of VOC containing materials, including coatings, cleaning agents, and contaminated rags.
18. Provide a copy of all emission control system (i.e., scrubber, regenerative thermal oxidizer, etc.) studies, reports, or analyses discussing emission rates of any pollutant at the facility.
19. Provide the dimensions of the combustion chamber of the facility's Regenerative Thermal Oxidizer (RTO).
20. Provide a copy of the operating manual(s) for the facility's RTO and its monitoring system (if any).

21. Provide all documents related to all studies, inspections, or evaluations associated with the emission units to the RTO system that have been conducted or attempted at the facility, including but not limited to:
 - a. System improvements implemented based on findings of any study, inspection, or evaluation;
 - b. Modeling emissions of air pollutants to the atmosphere; and
 - c. Capture and collection of pollutants emitted by the facility.
22. Provide records showing the calibration, maintenance, and repair for the continuous monitoring system(s) at the RTO (if any).
23. Provide all records of repair, maintenance and modification on the RTO. For all repairs, identify whether the repairs were temporary or permanent and when the repair was finished. For all modifications, provide a statement that explains the reason the modification occurred. For all parts and components of the RTO currently in need of repair or maintenance, identify the part or component, the date it was determined to need repair or maintenance, and the schedule for completion of the repair or maintenance.
24. Provide a spreadsheet, in Microsoft Excel or compatible format, the following continuous records for the facility's RTO for each operating day:
 - a. A list of emission units and/or equipment whose air emissions are ducted to the RTO;
 - b. Operating records showing how many hours the RTO operated;
 - c. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission unit;
 - d. All successive 3-hour average RTO combustion temperatures; and
 - e. All successive 3-hour periods of time during which the average RTO combustion temperature below the average temperature observed during the most recent emission test that demonstrated that the emission unit complied with the VOC emission limit.
25. Provide the following information, which you are required to maintain under the recordkeeping requirements found in your Title V Permit. Submit the following information for each operating day (except required otherwise) for the Interior Drum Lining, Process K001, Exterior Drum Painting K002, and Drum Lid Painting/Lining K003:
 - a. The name and identification number of each coating/lining as applied;
 - b. The VOC content of each coating/lining, as applied, in pounds per gallon;
 - i. Include any Material Safety Data Sheets (MSDSs), literature, manuals, mass balance calculations or other information relied upon for determining this VOC content.
 - c. The number of gallons of each coating/lining employed;

- d. The total number of hours the emission unit was operated;
 - e. Total uncontrolled VOC emission rate for all coatings/linings in pounds;
 - f. The weight of VOC per volume of each coating/lining (minus water and any compounds that are specifically exempted from the definition of VOC according to 40 C.F.R. § 50.100(s), as applied each month on each coating line;
 - g. The name and identification of each cleanup material;
 - h. The VOC content of each cleanup material, in pounds per gallon;
 - i. The number of gallons of each cleanup material employed;
 - j. The total VOC emissions from all cleanup material employed, prior to any credit for recovered material, in pounds;
 - k. The usage of clean-up solvent, in units of gallons per month and gallons per year;
 - i. Include any Material Safety Data Sheets (MSDSs), literature, manuals, mass balance calculations or other information relied upon for determining this VOC content.
 - l. The amount of manifested waste sent off site for reclamation or disposal, in units of gallons per month and gallons per year.
26. Submit the following information for each day of the time period from January 1, 2014, for Natural Gas-Fired Drum Reclamation Furnace N002:
- a. The afterburner combustion temperature during the time of operation of the Furnace;
 - b. Number of drums charged into the furnace (drum per hour and drums per year);
 - c. Inspection maintenance logs for the drum reclamation furnace and after burner,
 - d. Details and dates of all repairs performed; and
 - e. Operating hours of the drum reclamation furnace (hours per year);
27. Provide the following information, which you are required to maintain under the recordkeeping requirements under your Title V Permit No. P0083383, which references 40 C.F.R. Part 63, Subpart M. Submit the following information for each day from January 1, 2014, for the Interior Drum lining K001, Exterior Drum Painting K002, and Drum Lid Painting/Lining K003 coating lines at the facility:
- a. A copy of each notification and report that the facility submitted to comply with 40 C.F.R. Part 63, Subpart M, and the documentation supporting each notification and report;
 - b. A current copy of information provided by material suppliers or manufacturers, such as manufacturer's formulation data, or test data, including summary sheets, used to determine the mass fraction of organic HAP and density for each coating, thinner and other additives, cleaning material, and the volume fraction of coating solids for each coating;
 - c. A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option used;
 - d. A record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month;
 - e. A record of the volume fraction of coating solids used each month;

- f. The calculation of the mass of organic HAP emission reduction by emission capture systems and add-on control devices;
 - g. The calculation of each month's organic HAP emission rate;
 - h. The calculation of each 12-month organic HAP emission rate;
 - i. A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period;
 - j. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight;
 - k. A record of the volume fraction of coating solids for each coating used during each compliance period;
 - l. The density of each coating, thinner, and/or other additive, and cleaning material used during each compliance period; and
 - m. Records of the date, time and duration of each deviation.
28. ICS shall submit an emission test protocol, conduct emission testing, and submit all other information requested within the schedules provided below for the facility. Specifically, ICS shall:
- a. Within 45 days of receipt of this request, submit a proposed emission testing protocol to measure VOC emissions from the drum exterior washing operation (Progressive Preflusher P017). This emission testing must be conducted in accordance with U.S. EPA Methods 1 through 4 and Methods 25 or 25A (40 C.F.R. Part 60, Appendix A), and Method 204 (40 C.F.R. Part 51, Appendix M). The emission test protocol shall specify the following:
 - i. All VOC emissions from the drums exterior Progressive Preflusher must be routed to the wet scrubber during the test, as demonstrated using Method 204. If all emissions are currently not being vented to these vents, ICS shall construct a temporary total enclosure ("TTE") for each emission unit;
 - ii. Three sampling runs will be conducted at each emission unit. Each run shall be at least one hour long; and
 - iii. Testing will be conducted at a production rate and process operating conditions that are consistent with representative (normal) conditions.
 - b. In advance of the tests, ICS must obtain approval from EPA on the testing and make any adjustments to the protocols required by EPA. Within 45 days after EPA approves your protocol, complete the emission tests in accordance with the approved testing protocols submitted per Request 28. a. and b.
 - c. At least 15 days prior to the planned emission test(s) under this request, submit notification to EPA via email (patel.manojkumar@epa.gov and R5airenforcement@epa.gov) and to OEPA of the intent to perform emission testing.

- d. Between the date of this request and the date of the emission test(s) required above, ICS shall perform only routine maintenance on the RTO or wet scrubber. *Any maintenance that is performed must be documented in the stack test report required in item f (below).; and*
- e. Within 30 days after completion of those tests, ICS shall submit a complete report of the emission test(s), including the following, at a minimum:
 - i. Summary of Results
 - 1. Results of the above specified emission tests (parts per million, pounds per hour, etc.);
 - 2. Process and control equipment data related to determining compliance;
 - 3. Discussion of any test errors;
 - 4. Discussion of any deviations from the reference test methods; and
 - 5. Production data.
 - ii. Facility Operations
 - 1. Description of the operation process;
 - 2. Operating parameters of the process at the time of the test, including but not limited to line speed, type of waste liquid container (washed or rinsed or processed), amount of waste liquid in the containers, name of waste liquid in each container, pressure drop across the scrubber, the liquid flow rate in gallons per minute across the scrubber, and the scrubber liquid pH; and
 - 3. Facility operating parameters that demonstrate that the facility was being operated at representative (normal) conditions.
 - iii. Sampling and Analytical Procedures
 - 1. Sampling port location(s) and dimensions of cross-sections;
 - 2. Sampling point description, including labeling system;
 - 3. Brief description of sampling procedures, including equipment and any diagrams;
 - 4. Description of sampling procedures (planned and accidental) that deviated from any standard methods;
 - 5. Brief description of analytical procedures, including calibration;
 - 6. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 - 7. Quality control/quality assurance procedures, tests, and results.
 - iv. Appendix
 - 1. Complete results with example calculations;
 - 2. Raw field data (original, not computer printouts);
 - 3. Laboratory report, with signed chain-of-custody forms;
 - 4. Calibration procedures and results;

5. Raw process and control equipment data, signed by plant representative;
6. Test log(s);
7. Project participants and titles; and
8. Related correspondence.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

1. Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;
2. Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and
3. A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent; and that disclosure of the information is likely to cause substantial harm to your business' competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

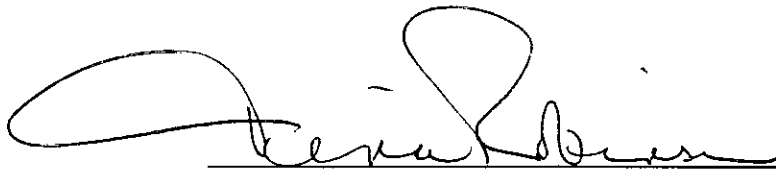
I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by
Certified Mail, Return Receipt Requested, to:

Brian Grannan, Facility Manager
Industrial Container Services, Inc.
1385 Blatt Boulevard
Gahanna, Ohio 43230

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by E-mail to:

Bob Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
bob.hodanbosi@epa.ohio.gov

On the 19th day of December 2018.


Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70170660000036618335